

1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

5
6 April 23 2025
7 Kavi Subramanian, Clerk
8 By Am J. Smith Deputy
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12 UNITED STATES DISTRICT COURT FOR THE
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE
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16

17 UNITED STATES OF AMERICA,

18 Plaintiff

19 v.

20 1. MARQUIS JACKSON,
21 2. MARKELL JACKSON,
22 3. MANDEL JACKSON,
23 4. EDGAR VALDEZ,
24 5. KEONDRE JACKSON,
25 6. MICHAEL YOUNG,
1. SIR TERRIQUE MILAM,
2. TYRELL LEWIS,
3. ROBERT JOHNSON,
4. MATELITA JACKSON,
5. MIRACLE PATU-JACKSON,
6. DIYANA ABRAHA,
7. ROBERT BELLAIR,
8. RONALD FINKBONNER,
9. PATRICK JAMES,
10. CHAD CONTI,
11. PHILLIP LAMONT ALEXANDER,
12. TREYVON MITCHELL, and
13. DEJAUN RANSAW.

14 Defendants.

15 NO. CR24-164 JNW

16 **SECOND SUPERSEDING INDICTMENT**

1 The Grand Jury charges that:

2 **COUNT 1**

3 **(Conspiracy to Distribute Controlled Substances)**

4 Beginning at a time unknown, and continuing until at least October 2, 2024, in
 5 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of
 6 Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON, MANDEL
 7 JACKSON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR
 8 TERRIQUE MILAM, TYRELL LEWIS, ROBERT JOHNSON, MATELITA
 9 JACKSON, MIRACLE PATU-JACKSON, DIYANA ABRAHA, ROBERT BELLAIR,
 10 RONALD FINKBONNER, PATRICK JAMES, CHAD CONTI, PHILLIP LAMONT
 11 ALEXANDER, TREYVON MITCHELL, DEJAUN RANSOW, and others known and
 12 unknown, did knowingly and intentionally conspire to distribute controlled substances,
 13 including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), N-(4-
 14 fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (p-fluorofentanyl – a
 15 fentanyl analogue), methamphetamine, and marihuana, substances controlled under
 16 Title 21, United States Code.

17 The Grand Jury further alleges that with respect to MARQUIS JACKSON,
 18 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE
 19 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,
 20 ROBERT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON,
 21 DIYANA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK
 22 JAMES, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL,
 23 and DEJAUN RANSOW, their conduct as members of the conspiracy charged in
 24 Count 1, which includes the reasonably foreseeable conduct of other members of the
 25 conspiracy charged in Count 1, involved 400 grams or more of a mixture or substance
 26 containing fentanyl, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

1 The Grand Jury further alleges that with respect to MARQUIS JACKSON,
2 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE
3 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,
4 ROBERT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON,
5 DIYANA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK
6 JAMES, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL,
7 and DEJAUN RANSAW, their conduct as members of the conspiracy charged in
8 Count 1, which includes the reasonably foreseeable conduct of other members of the
9 conspiracy charged in Count 1, involved 100 grams or more of a mixture and substance
10 containing a detectable amount of any fentanyl analogue, in violation of Title 21, United
11 States Code, Sections 841(b)(1)(A).

12 The Grand Jury further alleges that with respect to EDGAR VALDEZ, their
13 conduct as members of the conspiracy charged in Count 1, which includes the reasonably
14 foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50
15 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500
16 grams or more of a mixture or substance containing a detectable amount of
17 methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21,
18 United States Code, Sections 841(b)(1)(A).

19 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
20 841(b)(1)(D), and 846.

COUNT 2

(Conspiracy to Commit Money Laundering)

A. The Conspiracy

24 Beginning at a time unknown, and continuing until at least October 2, 2024, in
25 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of
26 Washington, and elsewhere. MARQUIS JACKSON, MARKELL JACKSON,

1 MATELITA JACKSON, DIYANA ABRAHA, and others known and unknown, did
 2 knowingly combine, conspire, and agree with each other and with other persons known
 3 and unknown to the Grand Jury to commit offenses against the United States in violation
 4 of Title 18, United States Code, Section 1956, to wit:

5 1. To knowingly conduct and attempt to conduct financial transactions
 6 affecting interstate commerce and foreign commerce, which transactions involved the
 7 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled
 8 Substances as charged in Count 1, knowing that the transactions were designed in whole
 9 or in part to conceal and disguise the nature, location, source, ownership, and control of
 10 the proceeds of specified unlawful activity, and that while conducting and attempting to
 11 conduct such financial transactions, knew that the property involved in the financial
 12 transactions represented the proceeds of some form of unlawful activity, in violation of
 13 Title 18, United States Code, Section 1956(a)(1)(B)(i); and

14 2. To knowingly conduct and attempt to conduct financial transactions
 15 affecting interstate commerce and foreign commerce, which transactions involved the
 16 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled
 17 Substances as charged in Count 1, knowing that the transactions were designed in whole
 18 or in part to avoid a transaction reporting requirement under State or Federal Law, and
 19 that while conducting and attempting to conduct such financial transactions, knew that
 20 the property involved in the financial transactions represented the proceeds of some form
 21 of unlawful activity, in violation of Title 18, United States Code, Section
 22 1956(a)(1)(B)(ii).

23 All in violation of Title 18, United States Code, Section 1956(h).

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COUNT 3

(Distribution of a Controlled Substance)

On or about October 31, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl and p-fluorofentanyl (a fentanyl analogue), substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that the offense involved 100 grams or more of a mixture and substance containing a detectable amount of any fentanyl analogue.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4

(Distribution of a Controlled Substance)

On or about December 7, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 5

(Distribution of a Controlled Substance)

8 On or about March 7, 2024, in Snohomish County, within the Western District of
9 Washington, and elsewhere, MARKELL JACKSON, ROBERT JOHNSON, and others
10 known and unknown, did knowingly and intentionally distribute, and aid and abet the
11 distribution of, a controlled substance, including: fentanyl, a substance controlled under
12 Title 21, United States Code.

13 The Grand Jury further alleges that the offense involved 400 grams or more of a
14 mixture or substance containing fentanyl.

15 The Grand Jury further alleges that this offense was committed during and in
16 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
17 Substances).

18 All in violation of Title 21, United States Code, Sections 841(a)(1) and
19 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Possession with Intent to Distribute a Controlled Substance)

22 On or about December 7, 2023, in Whatcom County, within the Western District
23 of Washington, and elsewhere, ROBERT BELLAIR, MARKELL JACKSON, and others
24 known and known, did knowingly and intentionally possess, and aid and abet the
25 possession of, with the intent to distribute, a controlled substance, including: fentanyl, a
26 substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 7

(Possession with Intent to Distribute a Controlled Substance)

On or about February 9, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 841(b)(1)(C).

COUNT 8

(Possession with Intent to Distribute a Controlled Substance)

On or about July 22, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances):

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

(Possession with Intent to Distribute a Controlled Substance)

8 On or about August 21, 2024, in Whatcom County, within the Western District of
9 Washington, and elsewhere, PATRICK JAMES did knowingly and intentionally possess,
10 and aid and abet the possession of, with the intent to distribute, a controlled substance,
11 including: fentanyl, a substance controlled under Title 21, United States Code.

12 The Grand Jury further alleges that the offense involved 40 grams or more of a
13 mixture or substance containing fentanyl.

14 The Grand Jury further alleges that this offense was committed during and in
15 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
16 Substances).

17 All in violation of Title 21, United States Code, Sections 841(a)(1) and
18 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 10 - RESERVED

COUNT 11

(Possession with Intent to Distribute a Controlled Substance)

22 On or about October 2, 2024, in King County, within the Western District of
23 Washington, and elsewhere, CHAD CONTI did knowingly and intentionally possess,
24 with the intent to distribute, a controlled substance, including: fentanyl and
25 p-fluorofentanyl (a fentanyl analogue), substances controlled under Title 21, United
26 States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 12

(Possession with Intent to Distribute a Controlled Substance)

On or about October 2, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PHILLIP LAMONT ALEXANDER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 13

(Possession with Intent to Manufacture and Distribute a Controlled Substance)

On or about October 2, 2024, in King County, within the Western District of Washington, and elsewhere, MANDEL JACKSON, DEJAUN RANSAW, and others known and unknown, did knowingly and intentionally manufacture and possess, with the intent to distribute, and aid and abet the manufacture and possession of, with intent to

1 distribute, a controlled substance, including: marijuana, a substance controlled under
 2 Title 21, United States Code.

3 The Grand Jury further alleges that this offense was committed during and in
 4 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
 5 Substances).

6 All in violation of Title 21, United States Code, Sections 841(a)(1) and
 7 841(b)(1)(D).

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9 **FORFEITURE ALLEGATION**

10 The allegations contained in Counts 1 through 9 and 11 through 13 of this
 11 Indictment are hereby realleged and incorporated by reference for the purpose of alleging
 12 forfeiture.

13 Upon conviction of any of the offenses alleged in Counts 1, 3 through 9, and 11
 14 through 13, MARQUIS JACKSON, MARKELL JACKSON, MANDEL JACKSON,
 15 EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR TERRIQUE
 16 MILAM, TYRELL LEWIS, ROBERT JOHNSON, MATELITA JACKSON, MIRACLE
 17 PATU-JACKSON, DIYANA ABRAHA, ROBERT BELLAIR, RONALD
 18 FINKBONNER, PATRICK JAMES, CHAD CONTI, PHILLIP LAMONT
 19 ALEXANDER, TREYVON MITCHELL, and DEJAUN RANSAW shall forfeit to the
 20 United States, pursuant to Title 21, United States Code, Section 853(a), any property
 21 constituting or derived from proceeds traceable to the offense, as well as any property
 22 used or intended to be used to facilitate the offense.

23 Upon conviction of the offense alleged in Count 2, MARQUIS JACKSON,
 24 MARKELL JACKSON, MATELITA JACKSON, and DIYANA ABRAHA, shall forfeit
 25 to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any

1 property, real or personal, involved in the offense, or any property traceable to such
2 property.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
4 any act or omission of the defendants,

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:

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DATED: *4/23/2025*

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*Signature of Foreperson redacted pursuant
to the policy of the Judicial Conference of
the United States.*

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9 FOREPERSON

10

Signature of Teal Luthy Miller
11 TEAL LUTHY MILLER
12 Acting United States Attorney

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Signature of Vincent T. Lombardi
14 VINCENT T. LOMBARDI
15 Assistant United States Attorney

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Signature of Zachary W. Dillon
17 ZACHARY W. DILLON
18 Assistant United States Attorney

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